

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

McMANIMON, SCOTLAND & BAUMANN, LLC

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Sari B. Placona (splacona@msbnj.com)

*Counsel for Daryl Fred Heller, the Chapter 11 Debtor
and Debtor-in-Possession*

In re:

DARYL FRED HELLER,

Chapter 11

Case No. 25-11354 (JNP)

Debtor.

**FIFTH MONTHLY FEE STATEMENT OF McMANIMON, SCOTLAND & BAUMANN,
LLC, COUNSEL FOR CHAPTER 11 DEBTOR AND DEBTOR-IN-POSSESSION
FOR THE PERIOD FROM JUNE 1, 2025 THROUGH JUNE 30, 2025**

McManimon, Scotland & Baumann, LLC, counsel for the above-captioned debtor and debtor-in- possession, hereby submits this Fifth Monthly Fee Statement for the period from June 1, 2025 through June 30, 2025 (the “Fee Period”), pursuant to the Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court, entered on April 3, 2025 [Docket No. 170]. See coversheet attached as **Exhibit A** and invoice for the Fee Period attached as **Exhibit B**.

Dated: July 9, 2025

**McMANIMON, SCOTLAND
& BAUMANN, LLC**

*Counsel for Daryl Fred Heller, the Chapter 11
Debtor and Debtor-in-Possession*

By: /s/ Sari B. Placona
Sari B. Placona

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET

Debtor: Daryl Fred Heller Applicant: McManimon, Scotland & Baumann, LLC

Case No.: 25-11354 (JNP) Client: Daryl Fred Heller

Chapter: 11 Case Filed: February 10, 2025

**FIFTH MONTHLY FEE STATEMENT FOR MCMANIMON,
SCOTLAND & BAUMANN, LLC FOR THE PERIOD
FROM JUNE 1, 2025 THROUGH JUNE 30, 2025**

**SECTION 1
FEE SUMMARY**

FEE TOTALS:	\$58,976.00
DISBURSEMENT TOTALS:	\$1,538.09
TOTAL:	\$60,514.09
MINUS 20% HOLDBACK OF FEES:	(\$11,795.20)
AMOUNT SOUGHT IN 5th MONTHLY:	\$48,718.89

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED	HOURS	RATE	FEE
1. Anthony Sodono, III, Partner	1990	21.20	725.00	\$15,370.00
2. Joshua H. Raymond, Partner	1996	4.10	560.00	\$2,296.00
3. Sari B. Placona, Partner	2014	44.70	525.00	\$23,467.50
4. Joseph Zapata, Partner	1999	8.70	375.00	\$3,262.50
5. John Stern, Associate	2019	36.40	300.00	\$10,920.00
6. Scott D. Platton, Associate	2021	3.00	285.00	\$855.00
7. Connor Ashnault, Summer Associate	N/A	10.90	250.00	\$2,725.00
8. Stacy Lipstein	N/A	.40	200.00	\$80.00
TOTAL:		129.40		\$58,976.00

SECTION II
SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
Asset Analysis and Recovery Identification and review of potential assets including causes of action and non-litigation recoveries.	1.30	\$517.50
Asset Disposition Sales, leases, abandonment and related transaction work	0.00	0.00
Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.00	0.00
Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	.70	\$367.50
Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	76.40	\$37,531.00
Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	2.30	\$877.50
Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.00	\$0.00
Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	1.10	\$577.50
Fee/Employment Objections Review of an objections to the employment and fee applications of others.	1.50	\$755.00
Financing Matters under 361, 363 and 364 including cash collateral and secured clams; loan document analysis.	0.00	\$0.00

Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	37.10	\$13,302.50
Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	0.00	\$0.00
Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	3.50	\$1,420.00
Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362	0.00	0.00
Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.00	0.00
Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.00	0.00
Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.00	\$0.00
Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	1.70	\$1,232.50
Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.00	\$0.00
Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.00	\$0.00

Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.00	\$0.00
Valuation Appraise or review appraisals of assets.	0.00	\$0.00
Travel Time	3.80	\$2,395.00
SERVICE TOTALS:	129.40	\$58,976.00

SECTION III
SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
Filing Fees Payable to the Clerk of the Court	\$34.00
Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$171.37
Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$215.40
In-house Reproduction Services Exclusive of overhead charges.	\$51.80
Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
Travel Mileage, tolls, airfare, parking.	\$356.09
Courier & Express Carriers Overnight and personal delivery.	\$88.09
Postage	\$355.68
Other: Meals	\$108.46
Other: Transcripts	\$157.20
DISBURSEMENTS TOTAL:	\$1,538.09

I certify under penalty of perjury that the above is true.

Dated: July 9, 2025

/s/ Sari B. Placona

Sari B. Placona

EXHIBIT B



July 9, 2025

Daryl Heller

Invoice #: 244515
Client #: 35240
Matter #: 1
Billing Attorney: SBP

INVOICE SUMMARY

For Professional Services Rendered Through June 30, 2025.

RE: Deerfield Capital, LLC - Bankruptcy Chapter 11

Total Professional Services	\$ 58,976.00
Total Disbursements	<u>\$ 1,538.09</u>
TOTAL THIS INVOICE	\$ 60,514.09



PROFESSIONAL SERVICES

Date	Atty	Task	Description	Hours	Amount
4/24/25	SDP	LIT	Heller research on PA case law regarding personal liability for business etc.	3.00	855.00
6/01/25	SBP	LIT	Call with client and H Sorvino re prestige issues	.90	472.50
6/02/25	CA	LIT	Reviewed edits on motion to quash subpoena	.40	100.00
6/02/25	CA	LIT	Chart of all pleadings scheduled for June 10, 2025	.70	175.00
6/02/25	CA	LIT	Revised chart of complaints 6/10, added related ECF complaints/ objections from Pacer	.30	75.00
6/02/25	JDS	CAS	Review Client's comments and edits to Objection to Prestige Objection to 9019 Motion Approve Agreement with Deerfield.	.40	120.00
6/02/25	JDS	LIT	Revise Reply to Prestige Objection to 9019 Motion incorporating Client's comments and adding additional information.	1.70	510.00
6/02/25	JDS	CAS	Revise Motion to Quash Prestige Subpoena to Examiner.	.50	150.00
6/02/25	JDS	CAS	Implement Client's edits and make revision to Reply to Prestige Objection to 9019 Motion.	.70	210.00
6/02/25	SBP	LIT	Review letter from M Kizner serving adversary 25-1199	.10	52.50
6/02/25	SBP	CAS	Call with client and H Sorvino re Prestige opposition to settlement	.50	262.50
6/02/25	SBP	CLAIM	Call with H Sorvino and M Kizner re Prestige claims	.50	262.50
6/02/25	SBP	CAS	Call with client and H Sorvino re Prestige status	.20	105.00
6/02/25	SBP	LIT	Review Silverview Objection to 9019 motion with Deerfield	.20	105.00
6/02/25	SBP	CAS	Call with client re 401k funds	.20	105.00
6/02/25	SBP	CAS	Revise motion to quash Prestige subpoena on Examiner	.10	52.50
6/03/25	AS1	CAS	Analyze objections and responses	.80	580.00
6/03/25	AS1	DATA	Analyze case law	.50	362.50
6/03/25	AS1	FEEOB	Analyze and revise objection to Examiner's fees	.20	145.00
6/03/25	AS1	FEEOB	Discuss with Sari B. Placona Examiner's fees and objection	.20	145.00
6/03/25	CA	CAS	Drafted Motion to Extend Exclusivity, NOM, and proposed order for Motion to Extend	2.00	500.00
6/03/25	CA	CAS	Updated nondischarabilty complaints chart heller	.20	50.00
6/03/25	CA	CAS	Revised and edited 6/10 chart of scheduled hearings for Heller case; added new objections and hearings as of 6/3	.40	100.00
6/03/25	CA	PDS	Revised Motion to Extend Time of Exclusivity draft	.90	225.00
6/03/25	CA	CAS	Revised Pleadings scheduled chart 6/10 to include new pleadings/ objections filed today 6/3	.50	125.00
6/03/25	JDS	PDS	Review Debtor's assets and creditors claims to compile list for Debtor's Plan.	.50	150.00
6/03/25	JDS	FEEOB	Revise limited objection to Examiner and his counsel and financial advisor fee applications.	.50	150.00



Date	Atty	Task	Description	Hours	Amount
6/03/25	JDS	CAS	Correspond with Client and advise as to due dates for reply to objections to Rule 9019 motions.	.30	90.00
6/03/25	JDS	CAS	Revise letter in support of Deerfield Motion to Suspend Examiner.	.30	90.00
6/03/25	JDS	CAS	Further revise Reply to Prestige Objection to 9019 Motion and send to Client for review/ comments/ approval.	.30	90.00
6/03/25	JDS	CAS	Review Reply to Prestige Objection regarding Client's comments, send follow up email to Client for clarification.	.40	120.00
6/03/25	JDS	CAS	Phone call with Client to discuss final edit to Reply to Prestige Objection to 9019 Motion	.30	90.00
6/03/25	JDS	PDS	Review and revise brief for Motion to File Extension of Exclusivity Period.	.70	210.00
6/03/25	JDS	CAS	Revise Reply to Prestige Objection pursuant to Client's comments.	.50	150.00
6/03/25	JDS	CAS	Review status of June 10 hearing date as to whether any objections or replies were filed, send email.	.10	30.00
6/03/25	JDS	CAS	Revise Reply to Prestige Objection pursuant to A. Sodono comments.	1.40	420.00
6/03/25	SBP	CAS	Email J Stokes re notice of jury fees	.10	52.50
6/03/25	SBP	LIT	Email client re Silverview complaint	.10	52.50
6/03/25	SBP	CAS	Review Prestige objection to motion to quash subpoena	.10	52.50
6/03/25	SBP	CAS	Revise reply to objection by Prestige to 9019 settlement with Deerfield	.20	105.00
6/03/25	SBP	CAS	Review and revise opposition to Prestige motion to appoint trustee	.20	105.00
6/03/25	SBP	BOPS	Call with client re Form 426	.20	105.00
6/03/25	SBP	CAS	Review objections to settlements	.70	367.50
6/04/25	CA	CAS	Revised Heller 6/10 complaints chart: added ECF 304 and updated	.30	75.00
6/04/25	JDS	CAS	Review June 10 hearing binders and provide to A. Sodono and J. Sherry for review.	.10	30.00
6/04/25	SBP	CAS	Review email from client to Deerfield re settlement	.10	52.50
6/04/25	SBP	CAS	Revise letter to court in support of Deerfield motion to suspend examiner	.10	52.50
6/04/25	SBP	LIT	Email with J Stokes re FC Holdings complaint	.10	52.50
6/04/25	SBP	CAS	Prepare for hearings on June 10th	.70	367.50
6/05/25	AS1	CAS	Analyze several emails re objection, taxes, and strategy	.40	290.00
6/05/25	AS1	CAS	Discuss with Sari B. Placona strategy, objection, and taxes	.20	145.00
6/05/25	AS1	CAS	Review Silverview objection	.20	145.00
6/05/25	AS1	CAS	Discuss Silverview objection with Sari B. Placona	.10	72.50
6/05/25	AS1	CAS	Review Orrstown reply	.30	217.50



Date	Atty	Task	Description	Hours	Amount
6/05/25	AS1	CAS	Discuss with Sari B. Placona Orrstown reply	.10	72.50
6/05/25	JDS	CAS	Review Client's prior email to provide update S. Placona status of Client's review of Chicago Atlantic Objection to 9019 Motion.	.10	30.00
6/05/25	JDS	CAS	Revise Reply to Silverview and Chicago Atlantic Objections.	.30	90.00
6/05/25	JDS	CAS	Draft Reply to Silverview and Chicago Atlantic Objections.	1.20	360.00
6/05/25	SBP	CAS	Email with R Ayling re missing tax returns	.10	52.50
6/05/25	SBP	CAS	Discuss Chicago Atlantic objection to Deerfield settlement with client	.10	52.50
6/05/25	SBP	LIT	Review summons for Deerfield nondischargeability complaint	.10	52.50
6/05/25	SBP	CAS	Call with client re case status	.30	157.50
6/05/25	SBP	LIT	Call with H Sorvino and A Ciardi re Deerfield settlement	.20	105.00
6/05/25	SBP	PDS	Call with A Ciardi re plan	.20	105.00
6/05/25	SBP	CLAIM	Zoom call with H Sorvino, M Kizner, and J Voss re Prestige claim	.40	210.00
6/05/25	SBP	CLAIM	Call with client and H Sorvino re Prestige claim	.20	105.00
6/05/25	SBP	LIT	Call with M Weiss and L Gibbons re Orrstown settlement	.70	367.50
6/05/25	SBP	CAS	Call with client re comment to reporter	.10	52.50
6/05/25	SBP	CAS	Draft email to Prestige re settlement offer	.10	52.50
6/05/25	SBP	BOPS	Review revised Form 426	.20	105.00
6/05/25	SBP	CAS	Review Orrstown reply in support of settlement	.20	105.00
6/05/25	SBP	AAR	Call with L Gibbons and client re beach house proceeds	.20	105.00
6/05/25	SBP	PDS	Revise motion to extend exclusivity to file plan	.30	157.50
6/06/25	AS1	CAS	Review Charlene Heller response to Orrstown	.20	145.00
6/06/25	AS1	CAS	Discuss with Sari B. Placona Charlene response to Orrstown	.10	72.50
6/06/25	AS1	PDS	Draft and amend exclusivity motion	.50	362.50
6/06/25	JDS	CAS	Revise Reply to Silverview and Chicago Atlantic Objections to Deerfield Agreement 9019 Motion.	1.30	390.00
6/06/25	JDS	CAS	Review revised Reply to Silverview and Chicago Atlantic Objections to Deerfield Agreement 9019 Motion.	.80	240.00
6/06/25	SBP	LIT	Review C Heller memo in support of settlement with Orrstown	.20	105.00
6/06/25	SBP	LIT	Review objection and joinder of Steward Capital to settlement with Deerfield	.20	105.00
6/06/25	SBP	BOPS	Call with client and S Lipstein re Form 426	.30	157.50
6/06/25	SBP	LIT	Review client comments to Silverview objection to settlement	.20	105.00
6/06/25	SBP	LIT	Review Orrstown reply in support of settlement	.20	105.00
6/06/25	SBP	LIT	Review objection and Joinder of S Mitnick to settlement with Deerfield	.20	105.00
6/06/25	SBP	CAS	Email J Voss re settlement proposal	.20	105.00
6/06/25	SBP	LIT	Review and revise certification in support of settlement re 401k funds from L Gibbons	.20	105.00



Date	Atty	Task	Description	Hours	Amount
6/06/25	SBP	FEEOB	Review and revise C Adams reply to UST objection to retention of criminal counsel	.20	105.00
6/06/25	SBP	LIT	Revise reply to Silverview and Chicago Atlantic objection to Deerfield settlement	.30	157.50
6/06/25	SBP	LIT	Review and revise reply to Silverview and Chicago Atlantic objections to Deerfield settlement	.30	157.50
6/07/25	SBP	CAS	Call with client and H Sorvino re status of objections	.30	157.50
6/07/25	SBP	CAS	Review letter from Fund Managers to investors	.20	105.00
6/08/25	JDS	CAS	Review docket and objections in order to draft Letter Brief in Support of Omnibus Objection & Reply 9019 Motions Objections.	.70	210.00
6/08/25	JDS	CAS	Revise June 10 Hearing chart in preparation of June 10 hearing.	.30	90.00
6/08/25	JDS	CAS	Revise Reply to Chicago Atlantic Objection 9019 Motion Orrstown Agreement pursuant Client's comments.	.20	60.00
6/08/25	JDS	CAS	Draft Letter Brief in Support of Omnibus Objection & Reply 9019 Motions Objections.	1.20	360.00
6/08/25	SBP	LIT	Revise reply in support of Orrstown settlement	.30	157.50
6/08/25	SBP	LIT	Email J Voss re settlement offer	.10	52.50
6/08/25	SBP	CAS	Prepare for June 10 hearings	2.20	1,155.00
6/09/25	AS1	CAS	Call with Sari B. Placona to discuss status/strategy for 6/10/2025 hearing	.40	290.00
6/09/25	AS1	CAS	Review pleadings and outline issues to prepare for 6/10 court hearings	2.40	1,740.00
6/09/25	JDS	CAS	Revise June 10 chart with all hearings.	.20	60.00
6/09/25	JDS	LIT	Provide Client with Prestige Funds nondischarge complaint.	.10	30.00
6/09/25	JDS	CAS	Compile all Prestige Fund managers complaints and send to Client for review.	.20	60.00
6/09/25	JDS	CAS	Continue drafting Letter Brief in Support of Omnibus Objection & Reply 9019 Motions Objections.	1.20	360.00
6/09/25	JDS	CAS	Revise Letter Brief in Support of Omnibus Objection & Reply 9019 Motions Objections.	.40	120.00
6/09/25	JDS	CAS	Redline Consolidated Reply to Objections to Orrstown and Deerfield 9019 Motions.	.20	60.00
6/09/25	SBP	PDS	Revise motion to extend exclusivity to file plan	.20	105.00
6/09/25	SBP	CAS	Call with client, A Sodono, J Vandermark, and H Sorvino re June 10 hearings	1.70	892.50
6/09/25	SBP	LIT	Certification of L Gibbons supporting Orrstown settlement	.10	52.50
6/09/25	SBP	LIT	Call with A Ciardi and H Sorvino re 9019 objections	.30	157.50
6/09/25	SBP	CAS	Call with client and H Sorvino re court hearings	.20	105.00
6/09/25	SBP	CAS	Review text from court re hearings	.10	52.50
6/09/25	SBP	CAS	Call with client re settlements and status	.20	105.00



Date	Atty	Task	Description	Hours	Amount
6/09/25	SBP	FEEOB	Review objection of examiner to MSB Fees	.20	105.00
6/09/25	SBP	CAS	Email reporter re comment	.10	52.50
6/09/25	SBP	LIT	Review and revise reply to objections to Deerfield settlement	.30	157.50
6/09/25	SBP	CAS	Prepare for June 10th hearings	1.70	892.50
6/09/25	SBP	CAS	Call with client status of hearings	.20	105.00
6/10/25	AS1	TRVL	Travel to/from US Bankruptcy Court, Camden, NJ (ACTUAL TIME 4.0)	2.00	1,450.00
6/10/25	AS1	CAS	Meeting before Court with client and Heidi Sorvino	1.10	797.50
6/10/25	AS1	CAS	Attend hearing on (1) motion to retain criminal counsel; (2) Prestige motion to quash 20024; (3) springer motion to extend time to file nondischargeability; (4) Deerfield motion re Examiner; and (5) motion to expunge Prestige claims	2.50	1,812.50
6/10/25	AS1	CAS	Prepare for court hearing on (1) motion to retain criminal counsel; (2) Prestige motion to quash 20024; (3) springer motion to extend time to file nondischargeability; (4) Deerfield motion re Examiner; and (5) motion to expunge Prestige claims and analyze Daryl Heller emails re addressing examiner report	.80	580.00
6/10/25	AS1	CAS	Draft memo of issues for hearing on (1) motion to retain criminal counsel; (2) Prestige motion to quash 20024; (3) springer motion to extend time to file nondischargeability; (4) Deerfield motion re Examiner; and (5) motion to expunge Prestige claims	.40	290.00
6/10/25	AS1	CAS	Analyze Examiner's report	.30	217.50
6/10/25	AS1	CAS	Communicate with client and H. Sorvino re Examiner's report	.30	217.50
6/10/25	AS1	CAS	Call with client, Sari B. Placona and Heidi Sorvino re Examiner's report and strategy/status	.90	652.50
6/10/25	SBP	CAS	Review Examiner first status report	.70	367.50
6/10/25	SBP	TRVL	Travel to court for hearing (half charge)	1.80	945.00
6/10/25	SBP	CAS	Call with A Sodono to discuss court hearings	.30	157.50
6/10/25	SBP	CAS	Call with H Sorvino and A Sodono re court hearings	.70	367.50
6/10/25	SBP	CAS	Call with client and A Sodono re examiner report	.70	367.50
6/10/25	SBP	FEEAP	Discuss criminal retention application with M Weis	.20	105.00
6/10/25	SBP	CAS	Attend court hearings	2.60	1,365.00
6/10/25	SBP	CAS	Debrief call with A Sodono and H Sorvino and client re court hearings	.20	105.00
6/11/25	CA	CLAIM	Draft letter to adversarial complainants and to the court requesting extension of time	.50	125.00
6/11/25	CA	CLAIM	Draft new chart of nondischarg. complaints	.70	175.00
6/11/25	JDS	CAS	Draft response to Examiner's First Interim Report pursuant client's comments.	1.00	300.00
6/11/25	JDS	CAS	Revise response to Examiner first interim report.	.60	180.00



Date	Atty	Task	Description	Hours	Amount
6/11/25	JDS	CAS	Revise response to Examiner's First Interim Report pursuant client's comments.	.50	150.00
6/11/25	SBP	CAS	Review draft response to examiner interim report	.20	105.00
6/12/25	AS1	CAS	Analyze reply/response to Examiner's first interim report	.90	652.50
6/12/25	JHR	CAS	Reviewed status of Subpoenas and deadlines for documents and depositions.	.10	56.00
6/12/25	SBP	LIT	Email with M Kizner re extensions on discovery and answers	.20	105.00
6/12/25	SBP	LIT	Review letter from M Kizner re answer to removed adversary	.10	52.50
6/12/25	SBP	CAS	Review email from client re audit report	.10	52.50
6/12/25	SBP	FEEAP	Call with K Gwyne re fee application	.20	105.00
6/12/25	SBP	CAS	Call with client re Prestige subpoenas	.20	105.00
6/12/25	SBP	CAS	Review and revise response to examiner	.20	105.00
6/13/25	CA	LIT	Phone call with John about anwser to Prestige comp. State court	1.40	350.00
6/13/25	CA	LIT	Began Answer	.30	75.00
6/13/25	JDS	CAS	Revise Response to Examiner First Interim Report.	1.20	360.00
6/13/25	JHR	CAS	Reviewed correspondence re deadline to respond to Subpoenas by Fund Managers.	.10	56.00
6/13/25	SBP	CAS	Call with client and A Sodono re response to examiner report	.50	262.50
6/13/25	SBP	CAS	Revise response to examiner report	.20	105.00
6/13/25	SBP	FEEAP	Review examiner application to release funds	.10	52.50
6/13/25	SBP	CAS	Call with examiner, H Sorvino, K Gwyne, and client re examiner report	.60	315.00
6/13/25	SBP	FEEAP	Call with C Adams re status of retention	.10	52.50
6/13/25	SBP	CAS	Call with client and H Sorvino re follow up call with examiner	.20	105.00
6/15/25	SBP	CAS	Review Bill of Sales from Examiner	.30	157.50
6/15/25	SBP	LIT	Email with J Kulbach re answer to 25-01216-JNP	.10	52.50
6/16/25	AS1	CAS	Call with Sari B. Placona, D. Heller, and H. Sorvino re court hearing and summary	.50	362.50
6/16/25	CA	LIT	Draft answer to Prestige, et. al. complaint.	1.50	375.00
6/16/25	CA	LIT	Revised Final edits of Answer to Complaint in PA state Court adv. in Bankruptcy	.80	200.00
6/16/25	JDS	LIT	Revise Answer to Prestige Complaint removed from Pennsylvania.	1.00	300.00
6/16/25	JDS	LIT	Review Answer to Prestige Removal Complaint.	.50	150.00
6/16/25	JZ	LIT	Preparation for call with Quentin Miller.	.10	37.50
6/16/25	JZ	LIT	Call with Quentin Miller re: properties and motion to be filed.	.30	112.50
6/16/25	JZ	LIT	Worked on motion for authorization to distribute properties.	.90	337.50
6/16/25	SBP	LIT	Communicate with J Cianciulli re extension of time on answer	.10	52.50
6/16/25	SBP	LIT	Communicate with M Weis re summary judgment motion	.10	52.50



Date	Atty	Task	Description	Hours	Amount
6/16/25	SBP	CAS	Review M Kizner proposed order re consolidation of claim	.10	52.50
6/16/25	SBP	CAS	Call with H Sorvino and client re Prestige chapter 11 trustee motion	1.30	682.50
6/16/25	SBP	CAS	Review subpoena from Examiner to Castle Hill	.10	52.50
6/16/25	SBP	CAS	Listen to court ruling on June 10 motions	.80	420.00
6/16/25	SBP	CAS	Call with H Sorvino re judge rulings	.10	52.50
6/16/25	SBP	CAS	Call with client and H Sorvino re Judge Rulings on 6.10.25 motions	.20	105.00
6/16/25	SLL	LIT	Prepare stipulations to extend time to answer in various adv. proceedings	.40	80.00
6/17/25	JDS	LIT	Review Adv. Pro. 25-01128-JNP, retrieve removed state court complaint and send to client to review in order to provide background and potential counterclaims.	.30	90.00
6/17/25	JDS	CAS	Draft letter to court requesting adjournment of 6/26 evidentiary hearing with background facts.	.70	210.00
6/17/25	JDS	LIT	Review email exchange with Prestige's counsel while drafting letter request for adjournment of June 26, 2025 evidentiary hearing.	.60	180.00
6/17/25	JDS	LIT	Draft adjournment request form for June 26, 2025 Evidentiary hearing for Prestige Motion to Appoint Trustee.	.20	60.00
6/17/25	JDS	LIT	Draft background facts for counterclaims and counterclaims for Prestige Complaint removed from state court.	1.60	480.00
6/17/25	JDS	LIT	Revise answer and counterclaims to Prestige Complaint.	1.20	360.00
6/17/25	SBP	LIT	Call with client re counterclaims to Prestige suit	.10	52.50
6/17/25	SBP	CAS	Communicate with H Freese re appeal stay vacated	.10	52.50
6/17/25	SBP	CAS	Email with M Kizner re motion to appoint trustee hearing	.20	105.00
6/18/25	JDS	CAS	Review Client's comments to Prestige Complaint, and documents provided for Answer and Counterclaims.	.70	210.00
6/18/25	JDS	LIT	Phone call with Client to discuss background facts and causes of action to Prestige's Complaint Adv. Pro. 25-01128-JNP.	.60	180.00
6/18/25	JDS	LIT	Phone call with Client to Discuss Answer with Counterclaims to Prestige Complaint.	.30	90.00
6/18/25	JDS	LIT	Review Client's comments to Answer to Prestige Complaint.	.30	90.00
6/18/25	JDS	LIT	Revise Answer to Prestige Complaint pursuant to Client's edits.	1.20	360.00
6/18/25	JHR	CAS	Call with S Placona to review subpoenas to be amended. Reviewed correspondence from S Placona to M Kizner	.20	112.00
6/18/25	JHR	CAS	Amend Subpoenas to W. Poole, D. Zook, J Hostetter and B Joffrey. Drafted cover letter to M Kizner.	.60	336.00
6/18/25	JHR	CAS	Correspondence form and to D Heller with revised and edited Subpoenas. Continued to revise and edit Subpoenas.	.30	168.00
6/18/25	JHR	CAS	Finalized Subpoenas and cover letter and served same upon M Kizner.	.40	224.00



Date	Atty	Task	Description	Hours	Amount
6/18/25	JZ	LIT	Worked on motion for authorization to make a distribution of properties.	2.10	787.50
6/18/25	SBP	CAS	Call with J Raymond re subpoenas to Prestige Funds	.10	52.50
6/18/25	SBP	CAS	Revise letter to M Kizner re amended subpoenas	.10	52.50
6/18/25	SBP	LIT	Call with client re answer to Prestige complaint	.20	105.00
6/19/25	JDS	CAS	Discuss Answer and Counterclaims to Prestige Complaint with S. Placona.	.10	30.00
6/19/25	JDS	CAS	Send email to client with questions for Client to provide facts/statements in order to supplement counterclaims to Prestige Complaint.	.30	90.00
6/19/25	JDS	CAS	Implement redlines edits by Client to Answer to Prestige Complaint.	.50	150.00
6/19/25	JDS	CAS	Draft email with questions for Client to provide additional information for Answer to Prestige Complaint based on his edits.	.20	60.00
6/19/25	JDS	CAS	Add causes of action to counterclaims on Prestige Complaint based on email exchange with Client.	.40	120.00
6/19/25	JDS	CAS	Review Client's email to determine if he provided all information needed to supplement Answer to Prestige Complaint.	.20	60.00
6/19/25	JDS	LIT	Revise Answer Prestige Complaint Adv. 25-1128 pursuant to Client's email with facts for Answer.	1.00	300.00
6/19/25	JDS	CAS	Finalize Client's edits to Answer Prestige Complaint Adv. 25-1128 pursuant to Client's email with facts for Answer.	.90	270.00
6/19/25	JZ	LIT	Continued preparation of pleadings and exhibits for a comfort order.	4.20	1,575.00
6/19/25	SBP	CAS	Call with client re status of complaint by Prestige	.10	52.50
6/19/25	SBP	LIT	Review and revise answer and counterclaims to Prestige Fund complaint	1.30	682.50
6/19/25	SBP	LIT	Call with client re answer and counterclaims to Prestige complaint	.30	157.50
6/19/25	SBP	FEEAP	Draft objection to Examiner application to be paid	.20	105.00
6/20/25	SBP	CAS	Call with A Ciardi and H Sorvino re status	.30	157.50
6/23/25	SBP	CAS	Call with client re case strategy	.40	210.00
6/23/25	SBP	CAS	Review and revise motion for authorization of sale of DHQM distribution	.90	472.50
6/24/25	JDS	LIT	Draft Rule 30(b)(6) Notice of Deposition to Prestige for Prestige Complaint, Adv. 25-1128, including definitions and questions for documents.	1.20	360.00
6/24/25	JDS	LIT	Revise Rule 30(b)(6) Notice of Deposition to Prestige for Prestige Complaint, Adv. 25-1128.	.20	60.00
6/24/25	SBP	CAS	Call with M Weis re status	.20	105.00
6/24/25	SBP	LIT	Review email from L Gibbons re Orrstown settlement	.10	52.50



Date	Atty	Task	Description	Hours	Amount
6/25/25	AS1	CAS	Call with Leo Gibbons and Daryl Heller re settlement with soiyse	.30	217.50
6/25/25	JDS	CAS	Revise Rule 30(b)(6) Notice of Deposition to be for Prestige's Motion to Appoint a Trustee.	.50	150.00
6/25/25	JDS	CAS	Finalize Notice of Deposition to Prestige.	.20	60.00
6/25/25	JDS	CAS	Send email to M. Coad with instruction for service of Notice of Deposition to Prestige.	.10	30.00
6/25/25	JDS	CAS	Revise letter to Prestgie's counsel serving Notice of Deposition and email Notice of Deposition.	.30	90.00
6/25/25	SBP	CAS	Call with A Ciardi re motion for trustee	.20	105.00
6/26/25	AS1	CAS	Zoom call with client, Sari B. Placona, and Heidi Sorvio re strategy and adversary discovery	.90	652.50
6/26/25	JHR	CAS	Reviewed subpoenas to be converted to Rule 45 and 9014 Subpoenas	.20	112.00
6/26/25	SBP	FEEAP	Review examiner third monthly fee statement	.10	52.50
6/26/25	SBP	LIT	Review letter from M Kizner re agenda for hearing on adversary proceedings	.10	52.50
6/26/25	SBP	FEEOB	Review examiner reply to opposition to fee app	.20	105.00
6/26/25	SBP	CAS	Attend court hearing on scheduling trustee motion and adversary proceedings	1.00	525.00
6/26/25	SBP	CAS	Review letter from Silerview re testimony	.10	52.50
6/26/25	SBP	PDS	Review opposition to motion to extend exclusivity by Prestige	.20	105.00
6/26/25	SBP	CAS	Review Prestige opp to motion to quash 2004 served by Prestige on examiner	.20	105.00
6/26/25	SBP	CAS	Call with client re status of trustee motion and calendar	.30	157.50
6/26/25	SBP	CAS	Call with client re strategy	.10	52.50
6/26/25	SBP	CAS	Call with client re court scheduling and strategy	.80	420.00
6/27/25	JDS	CAS	Listen to Court's decision to edit the retention order of McCarter & English as criminal counsel to the Debtor.	.40	120.00
6/27/25	JDS	CAS	Redline McCarter & English Retention Order pursuant to Court's decision.	.30	90.00
6/27/25	JHR	CAS	Drafted Rule 9014 Subpoenas to Joffrey, Poole, Hostetter and Zook.	1.20	672.00
6/27/25	JHR	CAS	Drafted Rule 45 Subpoenas to Joffrey, Poole, Hostetter and Zook.	1.00	560.00
6/27/25	JZ	AAR	Reviewed proposed revision to the certification in connection with the motion for a comfort order.	.10	37.50
6/27/25	JZ	AAR	Reviewed and responded to email from S. Placona re: the proposed language.	.10	37.50
6/27/25	JZ	AAR	Reviewed further email from S. Placona re: the parties and to proceed.	.10	37.50



Date	Atty	Task	Description	Hours	Amount
6/27/25	JZ	AAR	Drafted and sent email to D. Heller re: need for a response from Ethan Heller and/or the family re: the proposed language from the Miller side.	.10	37.50
6/27/25	JZ	AAR	Reviewed response from D. Heller.	.10	37.50
6/27/25	JZ	AAR	Telephone conference with S. Placona re: the email received and strategy..	.10	37.50
6/27/25	JZ	AAR	Drafted email to the parties re: revisions to be made and certifications needing to be signed.	.10	37.50
6/27/25	JZ	AAR	Revised the draft of the pleadings and sent pleadings to D. Heller to forward to Ethan Heller for review and execution.	.20	75.00
6/27/25	JZ	AAR	Reviewed and responded to email from Q. Miller re: the procedure.	.10	37.50
6/27/25	JZ	AAR	Reviewed email re: changes made to the certification to be signed by E. Heller.	.10	37.50
6/27/25	SBP	CAS	Call with client re case status	.20	105.00
6/27/25	SBP	CAS	Review client email re response to reporter on counterclaims	.10	52.50
6/27/25	SBP	FEEAP	Review and revise redline to McCarter retention order	.10	52.50
6/27/25	SBP	LIT	Revise notice of depositons via R 9014 to Prestige Fund managers	.40	210.00
6/27/25	SBP	CAS	Call with A Ciardi and H Sorvino re status	.30	157.50
6/27/25	SBP	LIT	Call with client re 9014 depositions	.20	105.00
6/28/25	SBP	CAS	Email client re 5th amendment privilege	.10	52.50
6/29/25	AS1	CAS	Call with Sari B. Placona and Daryl Heller re subpoenas and adversaries	.80	580.00
6/29/25	SBP	FEEAP	Review and revise first fee application	.10	52.50
6/29/25	SBP	CAS	Revise memo on taking the 5th in a bankruptcy	.30	157.50
6/29/25	SBP	CAS	Call with client and A Sodono re case strategy	1.30	682.50
6/30/25	AS1	CAS	Call with Daryl Heller and Heidi Sorvino re 7/1 hearing and Prestige withdrawal/subpoenas	.60	435.00
6/30/25	AS1	DATA	Analyze deposition notices, fund managers	.30	217.50
6/30/25	AS1	DATA	Analyze Charlene settlement agreement	.30	217.50
6/30/25	AS1	CAS	Discuss with L. Gibbons Charlene settlement agreement	.20	145.00
6/30/25	AS1	CAS	Call with Daryl Heller and L. Gibbons re settlement and funds in the estate, claims, sales	.90	652.50
6/30/25	AS1	DATA	Analyze case law on taking Fifth and negative inference, plan confirmation	.60	435.00
6/30/25	SBP	CAS	Discuss Prestige actions with A Sodono re trustee motion	.20	105.00
6/30/25	SBP	CAS	Review letter from M Kizner withdrawing motion for trustee	.10	52.50
6/30/25	SBP	CAS	Revise memo to client re 5th amendment	.10	52.50
6/30/25	SBP	CAS	Review M Weis email re additonal settlement with Orrstown	.10	52.50
6/30/25	SBP	CAS	Communicate with H Freese re appeal deadline	.10	52.50



Date	Atty	Task	Description	Hours	Amount
6/30/25	SBP	LIT	Email with M Kizner re answer to counterclaims	.10	52.50
6/30/25	SBP	CAS	Review client witness list for Prestige motion to appoint trustee	.10	52.50
TOTAL PROFESSIONAL SERVICES					\$ 58,976.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
CONNOR, ASHNAULT	10.90	250.00	2,725.00
ANTHONY SODONO, III	21.20	725.00	15,370.00
JOSHUA H. RAYMOND	4.10	560.00	2,296.00
JOHN STERN	36.40	300.00	10,920.00
JOSEPH ZAPATA	8.70	375.00	3,262.50
SARI PLACONA	44.70	525.00	23,467.50
STACY LIPSTEIN	.40	200.00	80.00
SCOTT D. PLATTON	3.00	285.00	855.00
Total	129.40		\$ 58,976.00

DISBURSEMENTS

Description	Amount
Meals	108.46
PACER	215.40
Court Reporting Fees	157.20
Westlaw	171.37
Overnight Express Mail	88.09
Travel/Parking Expenses	356.09
Postage	355.68
Filing Fee	34.00
Inside Duplicating	51.80

TOTAL DISBURSEMENTS \$ 1,538.09

TOTAL THIS INVOICE \$ 60,514.09